

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: *TSI Telecommunications Services, Inc.*

Contact *David J. Robinson*

Telephone Number: *(813) 273-3307*

e-mail:

Subject Matter Expert (SME): *(name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empower to make decisions and enter into agreements on behalf of the submitting carrier(s))*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

IV. Issue Identification

Name: (short identifier) *SBC inability to produce "billing detail" or "source data" associated with signaling.*

Brief Description: *In Wisconsin, Carriers have a choice to build their own SS7 network, acquire SS7 network services from a third-party provider (like TSI), or purchase signaling services from SBC. Building an SS7 network requires a substantial commitment of capital, and those carriers who either do not have the capital resources*

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available or who choose to commit those capital resources to other investment opportunities are left with the choice of purchasing signaling services from a third-party provider or directly from SBC. Third-party signaling providers carry no voice traffic and have no independent use for signaling messages, except to support the telephone calls of their carrier customers. TSI is a competitive alternative to SBC for signaling services. TSI owns its SS7 network; however, we depend on SBC to offer signaling services.

TSI signaling services supports local calls exchanged with SBC's network by our CLEC and CMRS customers. SBC denies it has a responsibility to provide billing detail to facilitate TSI's and other third-party signaling providers' ability to audit the signaling messages exchanged with SBC to determine accurate signaling message counts and proper jurisdictional billing treatment associated with the calls supported by SS7 services. Again, TSI has requested billing detail regarding signaling charges; SBC insists that the tariff does not include any requirement to produce billing detail for audit purposes.

Without reliable billing or source data it is impossible for TSI to audit and verify the accuracy of SBC's charges.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?
2. How many occurrences and approximately over how long a period of time?
3. Is it a recurring problem?
4. Your belief as to the cause of the problem.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?
7. Any other pertinent information?

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
3. Last known position of the opposing carrier.
4. Were any bill adjustments made to resolve this issue?
5. Were any policies or procedures changed to address this issue? If so, what changes were made?

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.

Putting aside the fact that TSI chose not to take the time to fill out the PSCW's issues request template form, SBC will attempt to address its allegation. SBC utilizes the CABS platform which adheres to Industry Standards to render its SS7 bills to carriers. In the case of TSI, it has taken it upon itself to sell SS7 hubbing services to third party carriers. As such, it is acting as a conduit or funnel for signaling messages to these downstream carriers. SBC provides the number of SS7 messages destined for the TSI SS7 network. As a hub provider, TSI must determine how it intends to assess its cost recovery for the use of its hubbing network. SBC indicates on each monthly CABS statement exactly how many signaling messages are received or sent to TSI. Platforms are available to hub providers such as TSI to capture and record signaling messages. It is incumbent upon TSI to find a platform suitable to its activities.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. No.

3. What performance measures can be implemented to monitor the desired system operation? N/A

4. Any other pertinent information? No.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. See above.

2. Were any bill adjustments made to resolve this issue? N/A

3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). N/A

4. Identify any other carrier(s) known to have experienced similar problems. N/A

5. Did you identify any other problems arising from or related to this issue? N/A

6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). N/A

7. Were any policies or procedures changed to address this issue? If so, what changes were made? N/A

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: SBC

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Contact : *James Jermain*
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Subject Matter Expert (SME): *Doug Faith*
Telephone Number: (312) 335-3089
e-mail: *df2364@sbc.com*

Authorized Representative: *Diana Young*
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X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*